

NICHOLAS M. WOOLDRIDGE  
Nevada State Bar No.: 8732  
WOOLDRIDGE LAW LTD.  
400 SOUTH 7<sup>TH</sup> STREET, SUITE 400  
LAS VEGAS, NV 89101  
TELEPHONE: (702) 623-6362  
FACSIMILE: (702) 359-8494  
EMAIL: NICHOLAS@WOOLDRIDGELAWLV.COM  
Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

ZACHARY PARKER,

*Defendant.*

Case No.: 2:15-cr-00108-KJD-NJK-2

**ORDER RE:  
UNOPPOSED FOURTH MOTION TO  
AMEND PRETRIAL RELEASE  
CONDITIONS AND FOR PERMISSION  
TO TRAVEL**

COMES NOW Defendant ZACHARY PARKER, by and through his attorney of record, NICHOLAS WOOLDRIDGE, ESQ., and hereby moves this Court to amend his pretrial release conditions to permit him to travel to Georgia for one week for a family reunion.

This motion is made and based upon the following memorandum, and all pleadings and papers on file herein.

**DATED** this 13<sup>th</sup> day of June, 2024.

/s/ Nicholas Woodridge

Nicholas M. Wooldridge, Esq.  
Wooldridge Law Ltd.  
400 South 7th Street, 4th Floor  
Las Vegas, NV 89101  
nicholas@wooldridgelawlv.com  
(702) 330-4645 Tel.  
(702) 359-8494 Fax.

**MEMORANDUM OF POINTS AND AUTHORITIES****A. PROCEDURAL HISTORY**

An Indictment was filed April 14, 2015 charging Mr. Parker with conspiracy to distribute a controlled substance as well as possession with intent to distribute a controlled substance (ECF No. 10). An arrest warrant was subsequently issued that same day (ECF No. 13). Mr. Parker was arraigned and pled not guilty to the Indictment on January 12, 2024 (ECF No. 50). Trial is scheduled for July 29, 2024 (ECF No. 61).

Prior requests for permission to travel to Houston, Texas were previously submitted by Mr. Parker, unopposed by the Government, and granted by this Court (ECF No. 54, 57, 58, 62). On prior occasions Mr. Parker traveled to Houston, provided all detailed information as required by this Court and/or pretrial services, and returned without incident. A prior request was also submitted and granted permitting Mr. Parker to travel to Lake Tahoe, Nevada with his son (ECF No. 64). On this most recent occasion, Mr. Parker provided all necessary information to pretrial services and returned without incident.

**B. THIS COURT SHOULD AMEND MR. PARKER'S PRETRIAL RELEASE CONDITIONS TO PERMIT HIM TO TRAVEL TO GEORGIA FOR A FAMILY REUNION.**

Pursuant to Mr. Parker's conditions of pretrial release, he must not travel outside of the State of Nevada (ECF No. 52 at p. 3). Presently, Mr. Parker seeks to travel to the State of Georgia for one week to attend a family reunion. Mr. Parker's brother, who he has not seen in fifteen years, will be in attendance.

Mr. Parker will provide detailed information concerning his travel to his pretrial officer, and will inform his pretrial officer upon his return to his home. Mr. Parker acknowledges he will continue to be monitored by GPS.

1 Mr. Parker has consulted with his pretrial services officer who has no objection to the  
2 request. Additionally, counsel has spoken with the Government, and the Government has no  
3 objection to this request.

4 For these reasons, Mr. Parker seeks a limited amended to his conditions of pretrial release  
5 to allow him to travel to Georgia, for one week, to attend a family reunion.  
6

7 **CONCLUSION**

8 For the reasons articulated above, Mr. Parker respectfully requests this Court grant this  
9 Motion, amending his pretrial release conditions to allow him to travel to Georgia, for one  
10 week, to attend a family reunion.

11 **DATED** this 13<sup>th</sup> day of June, 2024.

12  
13 /s/ Nicholas Woodridge

14 Nicholas M. Wooldridge, Esq.  
15 Wooldridge Law Ltd.  
16 400 South 7th Street, 4th Floor  
17 Las Vegas, NV 89101  
18 nicholas@wooldridgelawlv.com  
19 (702) 330-4645 Tel.  
20 (702) 359-8494 Fax.

21 **ORDER**

22 IT IS SO ORDERED that Defendant Parker's unopposed motion is GRANTED.  
23 Defendant Parker must provide Pretrial Services with a detailed travel itinerary. Pretrial  
24 Services shall continue to monitor Defendant Parker's travel via GPS.

25 DATED: 6/13/2024

26   
27 \_\_\_\_\_  
28 DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on 13<sup>th</sup> day of June, 2024, I served a copy of the foregoing

**FOURTH MOTION TO AMEND PRETRIAL RELEASE CONDITIONS AND FOR**

**PERMISSION TO TRAVEL** by U.S. District Court CM/ECF Electronic Filing to:

LAUREN IBANEZ

Lauren.ibanez@usdoj.gov

ROBERT KNIEF

Robert.Knief@usdoj.gov

/s/ Melody Phommaly

An employee of Wooldridge Law